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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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WELLS FARGO BANK, NATIONAL
ASSOCIATION, AS TRUSTEE FOR THE
REGISTERED HOLDERS OF AMHERST
PIERPOINT COMMERCIAL MORTGAGE
SECURITIES LLC, MULTIFAMILY
MORTGAGE PASS-THROUGH CERTIFICATES,
SERIES 2019-SB59

Docket No. 2:25-cv-00157-ES-JSA

**DECLARATION OF BORUCH
DRILLMAN IN OPPOSITION
TO THE MOTION**

Plaintiff

v.

MICH 424 PARK LLC

Defendant

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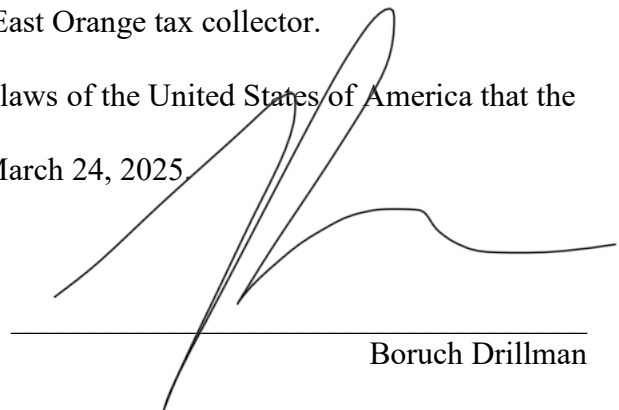
Pursuant to 28 U.S.C. § 1746, I, Boruch Drillman, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am the member of Defendant in this action and make this certification in Opposition to the motion.
2. As an initial matter, I did change the property manager to Estate Realty Management, which is run by an individual named Joel Goldman.

3. Based on Estate Realty Management's website and what Mr. Goldman has represented to me, they manage over 350 multifamily apartment houses, with over 3500 units managed. They are a professional company and ensure that the properties are well run and maintained, including the property in this case, 424 Park Avenue, East Orange, New Jersey (the "Property").
4. I switched management companies because of the poor performance of the prior management company.
5. Because of Estate Realty and Mr. Goldman, the Property is now in excellent condition, is almost fully rented and is largely performing. If he had been in place all along, we would be in a much better financial position vis a vis the Plaintiff.
6. Annexed hereto as **Exhibit A** is a true copy of the rent roll for the Property. As indicated therein, there is only one vacant unit at the Property and the rents cover the building expenses.
7. I regularly review reports concerning the Property and it is in excellent shape, and there is no risk to the Plaintiff from Estate Realty Management continuing to manage the Property. In fact, I have been told that Mr. Lagowitz, the proposed receiver has hired Estate Realty Management himself to manage some properties that he has been made the receiver of.
8. We pay all charges as they come do (other than the mortgage payments), and the tax lien referenced by the Plaintiff was an oversight as it appears to have come from a repair performed by the municipality prior to our being hired. Now that we are aware of it, we are seeking a redemption statement and will ensure that it is redeemed within the next

few days. I have directed Mr. Goldman to work on it diligently, and he has already requested a redemption statement from the East Orange tax collector.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 24, 2025.



A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, is written over a solid horizontal line.

Boruch Drillman